

John van Loben Sels (State Bar No. 201354)
WANG, HARTMANN, GIBBS & CAULEY, P.L.C.
2570 W. El Camino Real, Suite 440
Mountain View, California 94040
johnvanlobensels@whgclaw.com
Telephone: (650) 209-1230
Facsimile: (650) 209-1231

Peter A. Sullivan (New York State Bar No. 2563039)
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, New York 10004
sullivan@hugheshubbard.com
Telephone: (212) 837-6000
Facsimile: (212) 422-4726

Gregory M. Williams (District of Columbia Bar No. 467950)
HUGHES HUBBARD & REED LLP
1775 I Street, N.W., Suite 600
Washington, D.C. 20006
williamg@hugheshubbard.com
Telephone: (202) 721-4600
Facsimile: (202) 721-4646

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION**

**GABRIEL TECHNOLOGIES
CORPORATION and TRACE
TECHNOLOGIES, LLC,**
Plaintiffs,

vs.

**QUALCOMM INCORPORATED,
SNAPTRACK, INC., and NORMAN
KRASNER,**
Defendants.

CIVIL ACTION NO. 3:08-cv-01992-AJB-MDD

**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR AN ORDER TO SUBMIT
CERTAIN DOCUMENTS UNDER SEAL**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 **PLEASE TAKE NOTICE** that on August 10, 2012 in Courtroom 5 of the above-
3 captioned Court, located at 880 Front Street, San Diego, California, Plaintiffs Gabriel
4 Technologies Corporation and Trace Technologies, LLC (collectively "Plaintiffs"), will and
5 hereby do move the Court for an order permitting the filing under seal Plaintiffs Motion to
6 Exclude Opinion Testimony of Apostolos K. Kakaes, Ph.D., the Declaration of Ronald
7 Abramson in support of Plaintiffs Motion to Exclude Opinion Testimony of Apostolos K.
8 Kakaes, Ph.D., and the Declaration of Anant Sahai in support of Plaintiffs Motion to Exclude
9 Opinion Testimony of Apostolos K. Kakaes, Ph.D., along with their accompanying exhibits.

10 This Motion is based on this Notice of Motion and Motion, the accompanying
11 Memorandum of Points and Authorities, all records and papers on file in this action, and any
12 evidence or oral argument offered at any hearing on this Motion.

13
14 Dated: August 10, 2012

15 WANG, HARTMANN, GIBBS & CAULEY, P.L.C.
16 HUGHES HUBBARD & REED LLP

17 /s/ John van Loben Sels

18 John van Loben Sels
19 Peter A. Sullivan
20
21
22
23
24
25
26
27
28